



HAND DELIVERED

FEB 11 2010

UTAH DIVISION OF
SOLID & HAZARDOUS WASTE
2010.00689

CD10-0041

February 11, 2010

Mr. Dennis R. Downs
Executive Secretary
Utah Solid and Hazardous Waste Control Board
P.O. Box 144880
Salt Lake City, UT 84114-4880

Subject: EPA ID No. UTD982598898. Class 2 Modification – Module VI,
Groundwater Monitoring

Dear Mr. Downs:

EnergySolutions LLC, hereby requests Executive Secretary approval of a Class 2 modification to revise Module VI of the State-issued Part B Permit. The modification would approve replacement of groundwater wells GW-124 and GW-123R with new wells GW-130 and GW-131. This permit modification affects Module VI, *Groundwater Monitoring*, of the State-issued Part B Permit. Due to the proposed changes, this permit modification request is Class 2 in accordance with 40 CFR 270.42, Appendix I, C.4. This modification is requested in support of Phase VI (sumps 10A and 10B) liner construction at the Mixed Waste Landfill Cell.

Construction activities associated with liner placement will come close enough to existing wells GW-123R and GW-124 to warrant accelerated abandonment. Attached please find figure 10001 MW 10A, B, which demonstrates that these wells are both within 8 feet of the foundation limits for Phase VI liner construction. Given the presence of heavy construction equipment and the processes that will be used for the liner construction project, it may not be feasible to protect these wells from damage.

Samples from GW-123R and 124 were obtained on Thursday, February 11, 2010, fulfilling the annual sampling requirement. Data from this sampling event will be submitted by April 12, 2010.

Subsequent to DRC and DSHW approval of the new well locations, groundwater well GW-130 was installed on August 6, 2009; GW-131 was installed on August 18, 2009. As-Built reports were submitted for both wells on October 28, 2009, under cover letter CD09-0290. Fourth Quarter, 2009 (09Q4) samples from both wells were obtained on October 22, 2009 and submitted for Division review on February 1, 2010. In accordance with Condition VI.F.2, three more initial quarterly sampling events will be conducted in 2010 for GW-130 and GW-131. These wells will then default to annual sampling in 2011. Enclosed please find redline/strikeout changes to Module VI and check No.



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111073 for processing of this request. Electronic files will be forwarded via electronic mail.

Following Division approval, wells GW-124 and GW-123R will be abandoned in accordance with Attachment VI-3 of Module VI.

As required by 40 CFR 270.42(b)(2), a notice of this modification and the public comment period will be printed in the following local newspapers: *Salt Lake Tribune*, *Deseret News*, and *Tooele Transcript Bulletin*. A public notice will also be sent to individuals and organizations on the facility mailing list. A copy of the notice is included with this request. The 60-day public comment period will begin on February 11, 2010. A public information meeting has been scheduled for Tuesday, March 9, at the Tooele County Courthouse.

Please contact me at 801-649-2000 with questions regarding this request.

Sincerely,

A handwritten signature in black ink that reads "Sean McCandless".

Sean McCandless
Director of Compliance and Permitting

enclosures

cc: Otis Willoughby, DSHW (w/encl.)

Loren Morton, DRC (w/o encl.)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

MODULE VI

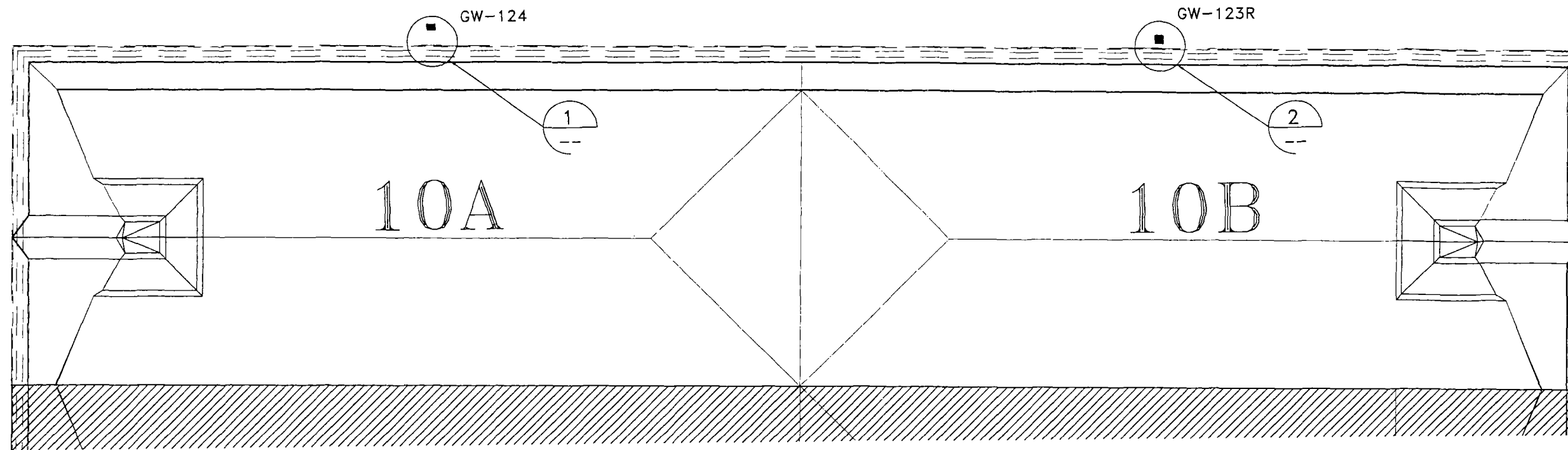
GROUNDWATER MONITORING

VI.A. APPLICABILITY

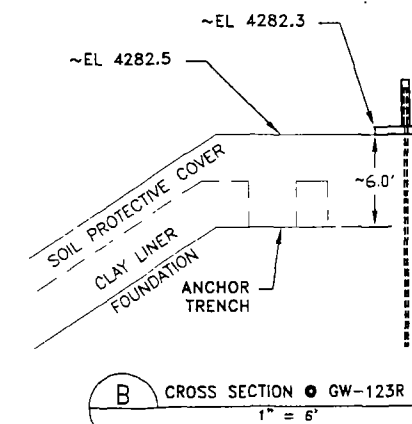
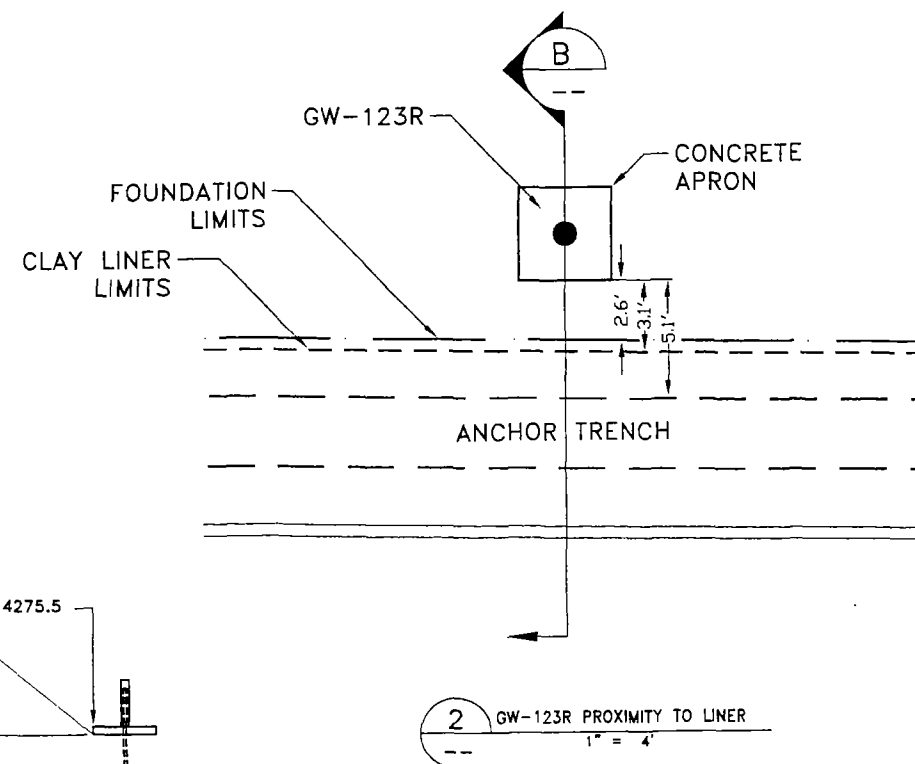
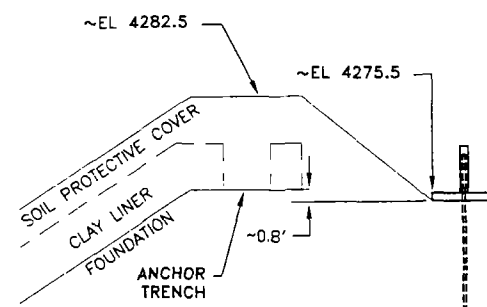
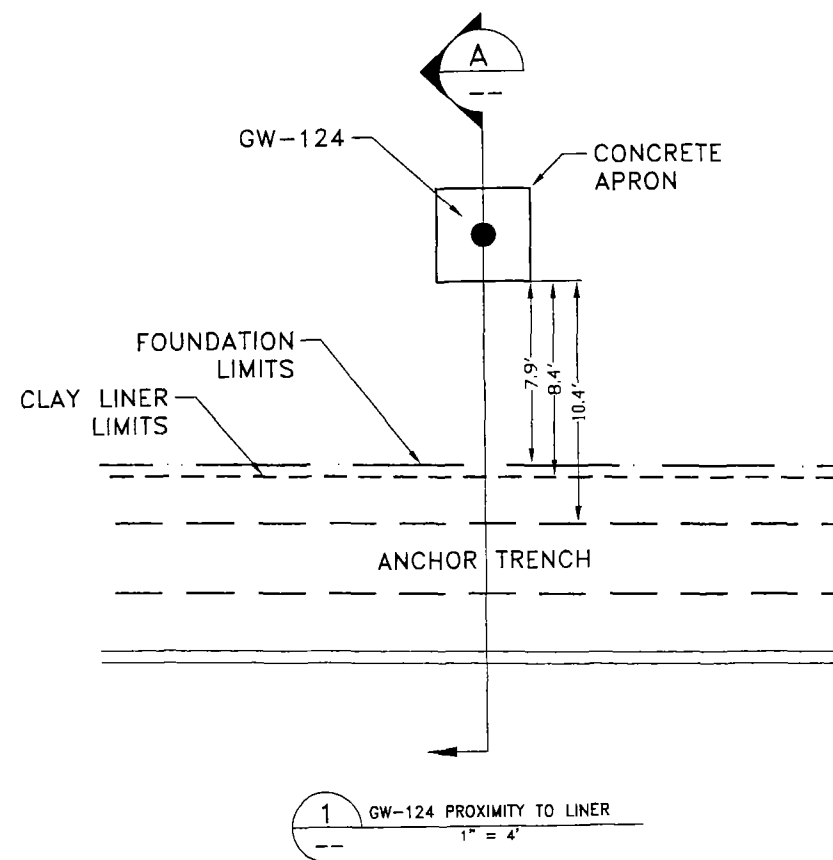
- VI.A.1. The requirements of this module shall pertain to all approved sumps specified in Table V-1 of Module V of this Permit.
- VI.A.2. A “unit” for the purpose of this Module shall be defined as a Mixed Waste Landfill Cell.
- VI.A.3. For the purpose of this Module, the term “compliance point” shall be defined as wells GW-41, GW-42, GW-66R, GW-67, GW-68, GW-69, GW-70, GW-118, GW-119, GW-120, GW-121, GW-122, GW-~~130+23R~~, and GW-~~131+24~~ as depicted within Attachment II-11, *Facility Drawings*.
- VI.A.3.a Sumps containing waste codes F020 through F023, F026, and F027 (dioxins and furans) shall have two “compliance point” monitoring wells located immediately down gradient of each sump pair. For example, if dioxin/furan waste is placed in sumps 8A and 8B, monitoring wells GW-119 and GW-120 will be designated as the “compliance point”.
- VI.A.4. For the purpose of this Module, the term “monitoring well” shall be defined as the wells identified in Condition VI.A.3. and wells GW-66R and I-1-30.
- VI.A.5. The installation of new monitoring wells shall require a permit modification in accordance with Condition I.D.2. of this Permit.
- VI.A.6. As new land disposal units are completed at the Facility, the groundwater monitoring network associated with the new unit shall be subject to this Module.

VI.B. GROUNDWATER PROTECTION

- VI.B.1. The Permittee shall follow all of the provisions under R315-8-6, Groundwater Protection, and as defined by these permit conditions. For purposes of this permit, R315-8-6 shall apply to all units at the Facility listed in Condition VI.A.1.
- VI.B.2. The Permittee shall submit to the Executive Secretary for approval, a detailed plan for any proposed monitoring wells. The plan shall be submitted at least 30 calendar days prior to initiation of installation.



MIXED WASTE LINER - PHASE VI PLAN VIEW



ENERGYSOLUTIONS

ENERGYSOLUTIONS "CLIVE" FACILITY
MIXED WASTE PHASE VI LINER CONSTRUCTION
PROXIMITY OF GROUNDWATER WELLS TO PROJECT AREA
CLIVE, UTAH

INFO
FOR
INFORMATION
ONLY

DESIGNED BY
B. DICK
CHECKED BY
D. BOOTH
D. BOOTH
AS NOTED 2/02/10

10001
MW 10A,B